

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JAMES MICHAEL ALLMAN on behalf of)
himself and all others similarly situated,)
)
)
 Plaintiff,)
v.) Docket No. 14-cv-10138
)
)
AMERICAN AIRLINES, INC. PILOT)
RETIREMENT BENEFIT PROGRAM)
VARIABLE INCOME PLAN, STATE)
STREET BANK & TRUST COMPANY,)
LAURA A. EINSPANIER, CAROLYN E.)
WRIGHT, BRIAN J. MCMENAMY,)
PETER WARLICK, BEVERLY K.)
GOULET, MARK BURDETTE, AND)
JOHN & JANE DOES 1-50.)
)
)
Defendants.)

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff James Michael Allman (“Plaintiff” or “Allman”) hereby moves the Court as follows:

1. To preliminarily approve the Settlement Agreement between Plaintiff and Defendants under Federal Rule of Civil Procedure 23(e);
2. To approve the form and authorize the distribution of the Proposed Class Settlement Notice to the Class pursuant to Federal Rule of Civil Procedure 23(c) and (e);
3. To approve the Proposed Plan of Allocation;
4. To appoint a Settlement Administrator;
5. To set dates for a fairness hearing on the question of whether the proposed Settlement should be finally approved as fair, reasonable, and adequate as to the members of the Class, and for a hearing on the question of whether the motion of Class Counsel for attorneys’ fees, costs, and expenses and the motion for a service award to Plaintiff should be approved.

This Motion is based on the accompanying Memorandum in support thereof, the Declaration of R. Joseph Barton (“Barton Decl.”), the Declaration of Peter Romer-Friedman (“Romer-Friedman Decl.”) filed herewith, the attachments to those declarations, all of the pleadings and documents on file with the Court in this action, and further evidence and argument as may be submitted prior to the Court’s decision on this Motion.

Dated: July 21, 2016

Respectfully submitted,

/s/ Jason M. Leviton

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: July 21, 2016

/s/ Jason M. Leviton
Jason M. Leviton